

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT,
L.P.,¹

Debtor.

Chapter 11

Case No. 19-34054-s gj11

Rel. Dkt. Nos. 205, 336

**SECOND SUPPLEMENTAL DECLARATION OF CONOR P. TULLY
IN SUPPORT OF THE APPLICATION AUTHORIZING THE EMPLOYMENT
AND RETENTION OF FTI CONSULTING, INC. AS FINANCIAL ADVISOR TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

NUNC PRO TUNC TO NOVEMBER 6, 2019

Pursuant to 28 USC Section 1746, Conor P. Tully declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), an international consulting firm. I submit this declaration (the “Second Supplemental Declaration”) to supplement my prior declaration (the “Original Declaration”) that was submitted in connection with FTI’s retention by the Official Committee of Unsecured Creditors (the “Committee”) of Highland Capital Management, L.P., the debtor and debtor-in-possession in the above-captioned chapter 11 case (the “Debtor”). Unless otherwise noted, I have personal knowledge of the facts set forth herein.

2. On October 16, 2019, the Debtor commenced this case by filing a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

3. On December 6, 2019, the Committee filed an application to retain FTI as its Financial Advisor (the “Application”). In support of the Application, FTI filed the Original

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Declaration executed by the undersigned on behalf of FTI in accordance with the applicable sections of the Bankruptcy Code. On January 9, 2020, an order was entered authorizing the retention of FTI as financial advisor to the Committee (the “Retention Order”) [Dkt. No. 336].

4. As noted in the Application, FTI’s hourly rates are subject to periodic adjustment. Effective January 1, 2021, such hourly rate ranges are as follows:

	<u>Per Hour (USD)</u>
Senior Managing Directors	\$785 - 1,295
Directors / Senior Directors / Managing Directors	550 - 935
Consultants/Senior Consultants	335 - 680
Administrative / Paraprofessionals	155 - 290

These rates continue to be subject to periodic adjustment.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of January 2021

FTI CONSULTING, INC.
Financial Advisors to the Official Committee of
Unsecured Creditors of Highland Capital Management,
L.P.

By: /s/ Conor P. Tully
Conor P. Tully, Senior Managing Director
Three Times Square, 10th Floor
New York, New York 10036
Telephone: (212) 841-9355
Email: conor.tully@fticonsulting.com